

EPA
COPY

July 8, 2020

Robert Buettner, Chief
Air Compliance Branch
U.S. Environmental Protection Agency
Region 2 Office
290 Broadway, 21st Floor
New York, New York 10007-1866


Re: Response to Request for Information Pursuant to Section 114 of the Clean Air Act,
Reference Number: CAA-02-2020-1456

Dear Chief Buettner:

In response to your Request for Information Pursuant to Section 114 of the Clean Air Act, Reference Number CAA-02-2020-1456; please see the following Responses to Questions and supporting Exhibits from Brooklyn Resource Recovery, Inc. (BRR) with respect to the its facility located at 5811 Preston Court, Brooklyn, New York 11234 (the BRR Scrapyard).

Please do not hesitate to contact us should you require any further information.

Sincerely,



Pat Christopher, COO

①

Table of Contents

Table of Contents

Page 3	Certification of Response
Page 4	Question 1 Response
Page 5	Question 2 Response
Page 6	Question 3 Response
Page 7	Question 4 Response
Page 8	Question 5 Response
Page 10	Question 6 Response
Page 11	Question 7 Response
Page 13	Question 8 Response
Page 14	Question 9 Response
Page 16	Question 10 Response
Page 17	Question 11 Response
Page 18	Question 12 Response
Page 19	Question 13 Response
Page 20	Question 14 Response
Page 21	Question 15 Response
Page 22	Question 16 Response
Page 23	Question 17 Response
Page 24	Question 18 Response
Page 25	Question 19 Response
Page 26	Question 20 Response
Page 27	Question 21 Response
Page	Exhibit A re: Question 6
Page	Exhibit B re: Questions 10, 14, 16
Page	Exhibit C re: Questions 11, 12, 17
Page	Exhibit D re: Question 13
Page	Exhibit E re: Question 15
Page	Exhibit F re: Question 18
Page	Exhibit G re: Question 19
Page	Exhibit H re: Question 21

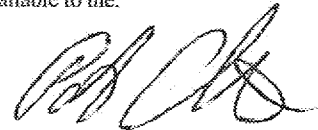
CERTIFICATION OF RESPONSE

State of NEW YORK

County of KINGS

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in response to the Information Request Letter and all documents submitted with this response, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted with this response are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that for one year from the date of the Information Request Letter, I am under an obligation to supplement my response to the Information Request Letter if any additional information relevant to the matters should become known or available to me.

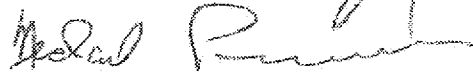
NAME Pat Christopher



TITLE Chief Operating Officer

SIGNATURE

Sworn to before me this 08 day of July, 2020



Notary Public

MICHAEL PICCINNINI
Notary Public, State of New York
No. 01PI6033812
Qualified in Kings County
Commission Expires November 29, 2021

1. Identify the person(s) responsible for answering each question set forth below in this Information Request. Include with your answer each person's name, job position/title, and a description of the person's responsibilities. Also state how long each person has been in that position, and if less than three years, what other positions each held in the three-year period prior to receipt of this Information Request.

Pat Christopher, Chief Operating Officer, Brooklyn Resource Recovery, Inc. Three (3) Years

Robert Rosselli, President, Brooklyn Resource Recovery, Inc. 31 Years

Christian Rosselli, Vice President, Brooklyn Resource Recovery, Inc. 31 Years

Pat Enoch, Environmental Consultant, Chemical Pollution Resources, Inc. 16 Years.

4

2. Provide the name(s) of the legal owner(s) and operator(s) of the metal shredding operation located at the BRR Scrapyard.

Brooklyn Resource Recovery, Inc. Owner, operator.

5

3. Identify all entities affiliated with the BRR Scrapyard, such as parent, subsidiary, and sibling corporations. Explain the ownership relationship between the BRR Scrapyard and these entities.

Ex. 4 CBI

4. Identify the person(s) responsible for environmental compliance at the BRR Scrapyard identified above.

Pat Enoch CHMM / CET
Chemical Pollution Resources, Inc.
19 Port Jenkins Lane
White haven, PA 18661

5. Provide a comprehensive description of the operations conducted at the BRR Scrapyard. Please include brief descriptions of how the BRR Scrapyard:

- i. obtains metal scrap materials from its upstream suppliers, including a description of private and commercial sources of metal scrap materials received on-site and from off-site sources;
- ii. processes metal scrap materials at its facility; transports its processed scrap metal from the site, including a brief description of the types of companies or entities that utilize its processed scrap metal.

USEPA QUESTION / ANSWER #5

Ex. 4 CBI



Ex. 4 CBI

9

6. Provide copies of a technical information drawing(s) or layout(s) of the BRR Scrapyard, that include detailed depictions of the hammermill shredder in both plan and section view.

See Exhibit A

10

7. Provide a list of all major operational equipment related to the shredding process, including all heavy-duty equipment and heavy machinery upstream and downstream of the hammermill shredder, used at the BRR Scrapyard. Please include a brief description and the application of each item listed.

Brooklyn Resource Recovery, Inc.

Ex. 4 CBI

11

Ex. 4 CBI

12

8. Provide the installation date, startup date, and manufacturer's rated capacity (in horsepower) of the motor used at the BRR Scrapyard to operate its hammermill shredder. Include the name of the manufacturer, model number, and the motor type (i.e., electric or diesel). Provide this same information for any backup motor(s) at the BRR Scrapyard or owned by the BRR Scrapyard but stored elsewhere.

USEPA QUESTION / ANSWER #8

Ex. 4 CBI

13

9. Provide the installation date, startup date, and the manufacturer's maximum design operational capacity (in gross tons per hour) of the hammermill shredder used at the BRR Scrapyard. Include the name of the manufacturer, the model number, size of the actual shredder box (in inches), and the number of hammers used in the shredder box. Provide this information for any backup shredder boxes owned by the BRR Scrapyard.

USEPA QUESTION / ANSWER #9

Ex. 4 CBI

Ex. 4 CBI

Ex. 4 CBI

15

10. For calendar year (CY) 2018 and CY 2019, indicate, on a monthly basis, how many motor vehicles were received and processed at the BRR Scrapyard.

See Exhibit B

16

11. Provide a general description of any depolluting processes and residual liquid removal measures used at the BRR Scrapyard. Include any standard operating procedures, employee training materials, presentations, and training schedules, detailing the process of how the facility drains or removes fluids (e.g., oils, fuels, anti-freeze) from motor vehicles and other types of scrap prior to shredding/crushing at the BRR Scrapyard.

USEPA QUESTION / ANSWER #11, # 12, #17

Ex. 4 CBI

Balance of Answer, See Exhibit C

17

12. Provide a general description of any depolluting processes and residual liquid removal measures that the BRR Scrapyard requires by any or all of its upstream scrap suppliers prior to acceptance of their scrap metal by the BRR Scrapyard. Include a description of how BRR Scrapyard verifies that the depolluting measures have been taken by upstream scrap suppliers.

USEPA QUESTION / ANSWER #11, # 12, #17

Ex. 4 CBI

Balance of Answer, See Exhibit C

13. Provide a general description of any air emission control equipment or process controls currently owned and/or in operation at the BRR Scrappyard. Include any operating parameter(s) of this control equipment that is monitored to ensure proper operation, if applicable.

USEPA QUESTION / ANSWER #13

Ex. 4 CBI

Balance of Answer, See Exhibit D

19

14. Provide scrap metal data for CY 2018 and CY 2019 for the total quantity of scrap metal processed by the hammermill shredder (in gross tons/month) at the BRK Scrapyard. Provide this data for both scrap metal input to the hammermill shredder and scrap metal output from the hammermill shredder, if available.

See Exhibit B

20

15. Provide the total hours of operation in hours per month for CY 2018 and CY 2019 for the hammermill shredder at the BRR Scrappyard.

See Exhibit E

16. Provide the percentage of automobiles versus non-automobiles processed by the hammermill shredder at the BRR Scrapyard for CY18 and CY19, along with an explanation of the data.

See Exhibit B

27

17. Provide example copies of any representative contracts or written agreements required of upstream scrap suppliers regarding acceptance of motor vehicles and other types of scrap at the BRR Scrapyard.

USEPA QUESTION / ANSWER #11, #12, #17

Ex. 4 CBI

Balance of Answer, See Exhibit C

23

18. Does the BRR Scrapyard have an Environmental Management System (EMS) plan pertaining to its shredder facility? If yes, submit a copy of its plan. An EMS plan is a set of processes and practices that enable an organization to reduce its environmental impacts and increase its operating efficiency. Information about EMS plans can be found on EPA's website, at <http://www.epa.gov/ems>.

See Exhibit F

19. Provide copies of any and all NYSDEC (State) and/or New York City (City) air emissions permits or registrations to operate the BRR Scrapyard.

See Exhibit G

25

20. Provide the basis for any emission limit(s) that apply to the hammermill shredder in any of the BRR Scrapyard's air permits or registration with the State or City.

Brooklyn Resource Recovery does not have any emission limits / permits that apply to a hammer mill shredder.

26

21. Provide all available emission calculations (e.g., particulate matter, lead, volatile organic compounds, other hazardous air pollutants) for the BRR Scrapyard for CY 2018 and CY 2019.

See Exhibit H

27